REMARKS

In response to the Office Action of August 8, 2006, claim 1 has been amended to include the elements of the piston claimed in independent claim 12. In view of this amendment, claims 8, 9, and 12-19 have been canceled to remove subject matter already claimed in one of pending claims 1-7, 10, or 11. Claim 10 has also been amended to remove its dependence from canceled claim 9.

It is respectfully submitted that amended claim 1 is neither anticipated nor made obvious by the prior art of record. Sawa et al. is the only reference cited as teaching a piston and plunger rod having the claimed first and second mating members, however Sawa et al. teaches nothing more than a typical piston and plunger rod. In order for a reference to anticipate, it must be sufficiently enabling, so as to place the public in possession of the claimed invention and allow them to practice it. *In re Donohue*, 766 F.2d 531 (Fed. Cir. 1985); *Rasmusson v. SmithKline Beecham Corp.*, 413 F.3d 1318, 1325 (Fed. Cir. 2005). Figs. 2 and 5 are ambiguous, because it is unclear whether they illustrate only a threaded piston cavity or a threaded plunger rod received within a threaded piston cavity, and even if they disclose the latter it is entirely unclear where one begins and the other ends. As Sawa et al. is concerned with a different problem, the specification does not clarify the relationship between the piston and the plunger rod, so a person having ordinary skill in the art can only conclude that the typical relationship is intended. Accordingly, the disclosure of Sawa et al. is not sufficient to place the claimed invention in the possession of the public, much less sufficient to allow the claimed invention to be practiced, so it cannot serve as an anticipatory reference.

While Figs. 2 and 5 are ambiguous, Fig. 1 unambiguously supports applicant's position that Sawa et al. is not anticipatory. Fig. 1 illustrates discontinuous external plunger rod threads which fit snugly into a proximal cavity of the plunger element 20. This is the only clear disclosure of the relationship between the piston and plunger rod threads and it fails to describe a connection configuration wherein the major and minor diameter of the threads of one of the plunger rod and the seal are smaller than the major and minor diameter of the threads of the other. Accordingly, Sawa et al. fails to anticipate or suggest the subject matter of amended claim 1, so reconsideration and allowance of claim 1 and all claims depending therefrom is respectfully requested.

With regard to the requirement to amend the specification to denote "parylene" as a trademarked term, it is respectfully submitted that "parylene" is not a trademark. Parylene is the generic term for a series of polymers, as described at column 4, lines 14-16 of U.S. Patent No. 6,270,872. Further, the only "parylene" trademark identified by the Office's Trademark Electronic Search System is Reg. No. 3,088,871 for PARYLENE HT, with the exclusive right to the use of "parylene" being specifically disclaimed. Accordingly, it is respectfully submitted that the specification requires no further amendment.

CONCLUSION

For the above reasons, it is respectfully submitted that the claims are in condition for allowance. Accordingly, reconsideration and allowance are respectfully requested.

Respectfully submitted,

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